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Attorneys for Defendant
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF HAYES P. HYDE IN
SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PORTIONS OF ITS
MOTION FOR LEAVE TO FILE
AMENDED LIST OF ELECTED TRADE
SECRETS, SUPPLEMENTAL EXPERT
REPORTS AND REVISED WITNESS AND
EXHIBIT LISTS [DKT. 2057]**

Courtroom: 8
Judge: Hon. William Alsup
Trial: December 4, 2017

ACTIVE/93234164.1

**HYDE DECLARATION ISO WAYMO'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

CASE No. 3:17-CV-00939-WHA

I, Hayes P. Hyde, declare as follows:

1. I am an attorney at the law firm of Goodwin Procter, LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion to File under Seal Portions of Its Supplemental Motion for Leave to File Amended List of Elected Trade Secrets, Supplemental Expert Reports and Revised Witness and Exhibit Lists ("Motion") and exhibits thereto [Dkt. No. 2055].

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibits 23 to the Declaration of Lindsay Cooper ("Cooper Decl.")	Paragraph 44

3. The above-referenced portions of Exhibit 23 includes highly confidential, sensitive business information relating to negotiations of the terms of Otto Trucking's agreements and corporate structure. This information is not publicly known, and its confidentiality is strictly maintained. I understand that this information could be used by competitors to Otto Trucking's detriment, including in the context of negotiating business deals. If such information were made public, I understand Otto Trucking's competitive standing could be significantly harmed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 27th day of October, 2017 in San Francisco, California.

/s/ Hayes P. Hyde
Hayes P. Hyde

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on October 27, 2017. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 27th day of October 2017.

/s/ Hayes P. Hyde
Hayes P. Hyde